

# IMPLEMENTING A COMPREHENSIVE STUDENT INFORMATION SYSTEM IN CALIFORNIA



CALIFORNIA POSTSECONDARY  
EDUCATION COMMISSION



# Executive Summary

This report presents the Commission's plan for developing a comprehensive student information system for California that will provide clearer understanding of how the State's public educational institutions serve the educational needs of California's citizens

This report stems from an earlier Commission document, *Feasibility Plan for a Comprehensive Student Information Study*, of March 1986 (Report 86-8) and the subsequent work of John G. Harrison of the Wyndgate Group, Ltd. -- the firm that conducted a study of the topic for the Commission. The Commission published Mr. Harrison's report, *A Comprehensive Student Information System*, in September 1988 as Report 88-32

In the current report, the Commission outlines an 11-step program that it will undertake during the fiscal 1988-89 year to create a pilot system that will address questions of system design and purpose at the policy level and identify cost and other implementation obstacles at the operating level.

The report is divided into six parts:

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The Commission adopted this report on recommendation of its Policy Evaluation Committee at its October 31, 1988, meeting. Additional copies of this and the related reports may be obtained from the Library of the Commission at (916) 322-8031. Questions about the substance of this report may be directed to Jane V. Wellman, the associate director of the Commission, at (916) 322-8017.

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**COMMISSION REPORT 88-36  
PUBLISHED OCTOBER 1988**



# Implementing a Comprehensive Student Information System in California

## Background

Assembly Bill 880 (Vasconcellos, 1985, codified as *Education Code* Sections 99170-99174) directed the California Postsecondary Education Commission to "develop a feasibility plan for a study to provide comprehensive information about factors that affect students' progress through California's educational system, from elementary school through postgraduate education." The bill further specified three broad objectives for that one-time study:

1. Improved understanding of the causes of differential attendance at all levels of education, to assist with the identification and evaluation of efforts to improve persistence toward obtaining a diploma, certificate, or degree.
2. Improved understanding of differences among subgroups in course selection patterns, academic aspirations, and their subsequent influence on occupational choice and satisfaction.
3. Improved understanding of the bridges and barriers encountered by students as they progress through their education, with particular emphasis on those factors and programs which affect students' transition from secondary to postsecondary institutions and transfer between institutions and segments of postsecondary education

In response to AB 880, the Commission presented its report, *Feasibility Plan for a Comprehensive Student Information Study*, to the Legislature in March 1986. In that report, the Commission discussed the feasibility of conducting a one-time study that would provide such information and the costs associated with such a study. However, after reviewing the status of existing student information systems, the Commission recommended that the State not undertake a one-time comprehensive study as suggested by the Legislature. Rather, it suggested that the

State begin development of a uniform student information system that would permanently improve reporting capabilities and provide a more accurate and uniform basis for all policy analysis. The Commission went on to recommend that an intersegmental task force be appointed and charged with:

1. Identifying a core of common information items to be available on all students enrolled in California public higher education,
2. Developing a mechanism to ensure the availability of this information within every public institution, and
3. Defining the concomitant annual reporting requirements.

The Commission also recommended that California's four public education segments jointly develop a budget change proposal for the 1987-88 Budget in order to establish a uniform student identification system for the State, adding that such a system should protect the privacy of individual students' identity and should limit access to data about them.

Following presentation of its report to the Legislature, the Commission requested and obtained funding to conduct a study that would examine the characteristics of a comprehensive student information system as described above, the costs associated with such a system, and the legal constraints that might impede the development and implementation of such a system. With this supplemental funding, in July 1987 the Commission solicited competitive bids for the study, and following evaluation of the proposals that it received, it selected The Wyndgate Group, Ltd., and Arthur Young & Company, an independent technical consultant group, to conduct the study.

## Work and findings of the consultants

Under the agreed-upon contract, the consultants

were responsible for convening and chairing the Comprehensive Student Information System Task Force, as well as preparing for their consideration materials that examined

- The structure and use of comprehensive student information systems in other states;
- The current nature, contents, and uses of student information systems already in place within California's public education segments; and
- The administrative, structural, fiscal, and legal barriers confronting educational institutions from participating in a comprehensive student information system and options for overcoming these barriers.

In addition, their final report to the Commission was to identify:

- A mechanism that would identify all students individually in California's public educational institutions;
- A core of common data elements available within every public educational institution for individual students;
- The statewide administrative structure necessary to develop and maintain the statewide student information system;
- Statewide and institutional costs for systematic and universal implementation of the system,
- Existing and needed legal restrictions necessary to protect students' rights to confidentiality of their records, and
- Routine annual reports about students that would be generated by the comprehensive student information system.

In fulfillment of their responsibilities under this contract, the consultants submitted their report, *A Comprehensive Student Information System* (Harrison, 1988), which examines the issues and elements listed above.

In Chapter One of their report, the consultants summarize the background surrounding the issue by discussing Assembly Bill 880, the Commission's report in response to that legislation, and its recommendation regarding the formation of a comprehensive student information system in California

In Chapter Two, they review the structure and use of student information systems in other states and also describe the nature, contents, and uses of the information systems already in place in California's public education segments

In Chapter Three, they examine the legal obstacles that must be confronted in order to implement a comprehensive student information system, including those elements that are necessary to protect students' rights to confidentiality of their records

In Chapter Four, they discuss the statewide administrative structure necessary to develop and maintain a comprehensive student information system, the core of common data elements that should be available within such a system for each individual student, and the types of reports that could be generated by that data being available within the system

Based on the observations outlined in those four chapters, in Chapter Five the consultants present their findings and recommendations. They find that the information necessary to conduct a study as called for by Assembly Bill 880 is not presently available and that in and among California institutions

- The automation and computerization of student record keeping systems varies considerably,
- Information that is available is not comparable due to a lack of commonly employed definitions among and between segments,
- Much of the information that should be gathered by the comprehensive student information system is already collected by California's public postsecondary institutions,
- Implementation and operating costs will likely be lower within postsecondary education than within elementary and secondary education largely because of the size of the enterprise and the present existence of automated record-keeping systems at the postsecondary level, and
- Additional legal questions regarding use of the Social Security number and disclosure of student information must be clarified before the system can be implemented to ensure that both the spirit and intent of privacy laws are preserved

With regard to their findings about comprehensive student information systems in use in or being devel-

oped by other states, they note that among the states that responded to their survey:

- No state has yet simultaneously developed a state-level comprehensive student information system for both its K-12 and postsecondary segments,
- In states that have begun the development of a comprehensive student information system, implementation of the system began at the postsecondary level and subsequently evolved to include elementary and secondary institutions, with Florida being the only exception to this finding;
- Interpretation of state and federal statutes governing the use of the Social Security number and the privacy rights surrounding its use tend to vary from state to state,
- No state has yet successfully merged its postsecondary education student information system with its K-12 information system to develop a comprehensive information system that includes both segments,
- Current information exchanges typically occur along organizational lines (i.e., from school to district to State) rather than along horizontal lines among peer institutions,
- Implementation of student information systems in other states has been the result of a need for improved record keeping, not improved policy analysis; and
- Among states that had implemented a state-level or systemwide student information system, state-level direction and funding were required for the project.

Finally, the consultants report that new or amended State and/or federal legislation and additional State funding will be necessary to implement a comprehensive student information system in California.

### **The consultants' recommendations**

Based on their findings, the consultants recommend that California proceed with implementation of the California Comprehensive Student Information System and that:

1. The State should develop and mandate a uniform unique student identification numbering system for all students enrolled in public and private K-12 and postsecondary education in California, and it should use the Social Security number as its unique student identifier, and that number should be voluntarily supplied by the student/parent when enrolling in an educational institution. When the Social Security number is not supplied, a unique substitute number should be developed, and students should be encouraged to supply that alternative number when subsequently enrolling in other educational institutions
2. The State Attorney General's Office, in cooperation with the public segments, should thoroughly evaluate the legal implications of assigning student identifiers, and the State should preclude the central repository of information for the system from disclosing actual student identifiers to anyone, including public policy analysts and educational researchers qualified to obtain data from the comprehensive student information system.
3. The public segments of education, in cooperation with appropriate State agencies, should develop a uniform student information collection and reporting program that employs comparable definitions for information reported and that attaches to that information the student's unique identifier
4. The State should solicit from the segments inter-segmental funding requests that would support implementation of the comprehensive student information system and that would enhance their own student information collection capabilities
5. The State should develop and mandate the creation of an "Education Clearinghouse" to serve as the central repository for the system's locator information. The Clearinghouse should be governed by representatives from various public and private educational institutions, and it should not maintain detailed records on individual students but instead only information on where detailed data is located
6. The State should begin implementation of the comprehensive student information system on two levels -- K-12, and postsecondary. Implementation of the system should be gradual and incremental, based upon the capabilities of the segments' existing information systems. In time, the

two levels should evolve into a single integrated State-level comprehensive student information system. In addition, private postsecondary institutions should participate in the system to the best of their ability

7. The State should develop a pilot program for implementing the comprehensive student information system. Implementation should begin first with public and private postsecondary institutions and eventually evolve to include all educational institutions.
8. The State should adopt enabling legislation for the system that includes designating the Social Security number as California's unique student identifier; establishing the reporting responsibilities of the segments; defining the Education Clearinghouse, its role, mission, and governance; and providing funding for the system's effective implementation and operation.
9. Finally, the State should establish a task force to provide leadership and guidance as the system begins implementation and to develop policy statements for the system and the Clearinghouse

### **Commission reactions**

The Commission has consistently made the development and implementation of a comprehensive student information system a high priority. As the Commission has reviewed the recommendations from the consultants, however, it has been concerned that a variety of issues related to the implementation of the system will need to be addressed if the system is to move forward. Its concerns emanate from questions about the practicality of implementing the system in the short term as recommended by the consultants. These concerns relate to costs, legal and organizational issues, and the logistics of intersegmental implementation.

### **Costs**

The costs associated with implementing a comprehensive statewide student information system remain unknown, but are likely to be extensive. The sophistication of the student information systems of

the several segments varies enormously, but all will require upgrading

- At the elementary and secondary school level, no statewide student information system exists, and individual school districts differ widely in the degree to which they have automated student information systems
- The Community College statewide information system is designed to capture a good deal of the data envisioned by a comprehensive student information system, but funding problems have kept that system from being implemented, and it is several years behind schedule
- Both the University of California and the California State University have existing statewide student information systems which are not far from being able to accommodate the demands of a comprehensive student information system
- Student economic information currently obtained by the Student Aid Commission cannot be integrated readily into the postsecondary pieces of a comprehensive information system, and no economic information is currently collected on elementary and secondary school students.

A necessary first step toward funding the system will be to learn more precisely what the likely costs may be. Once these figures are known, a strategy to identify how to meet the costs intersegmentally will be needed, since in the current funding climate the development of the system will have to compete with operational priorities that may appear to be more immediate. The budgetary obstacles are particularly severe at the K-12 level, both because of the lack of an existing statewide automated information system upon which a student information system could be added, and because of funding priorities for program improvement.

### *Legal and organizational issues*

The Commission has made the protection of individual student's privacy a high priority in the development of a statewide information system. The consultants' analysis suggests that privacy could be protected under current law with a voluntarily supplied Social Security number, supplemented where necessary with a State-assigned unique identifier. Because of the importance of the privacy issue to the

Commission, however, it believes legislation clarifying this issue is advisable.

A second set of issues on which legislation would be helpful relates to the organization and management of the system. The consultants recommended the establishment of an Education Clearinghouse, which in their vision would deal with the issue of privacy, overcome the K-12/postsecondary administrative gaps, and provide a mechanism under which the unique student identifying information would be maintained. The consultants also recommended creation of a Clearinghouse advisory committee to help make decisions about the use of information.

As it has reviewed the consultants' recommendations, the Commission has concluded that attention on the Clearinghouse obscures other questions about what should be administered at the State level and how it should be administered. In order to move forward with the system, the State needs to address these organizational issues, for they speak to the purposes and utility of the system. For example, at one end of the organizational continuum, the State would be responsible only for the assignment and maintenance of the unique student identifier, while the segments would keep the actual records. Under this scenario, any policy research requiring longitudinal information would have to come from the segments, which would be obligated to maintain access to student files not only for currently enrolled students but for students who have moved on. At the other end of the continuum, a State agency would maintain the student records, including the unique student identifier. If the system is to be useful for research and policy analysis, the latter scenario makes better sense. However, under that scenario, policy questions about who could gain access to student-based information and for what purposes will have to be addressed. The Commission believes these questions are of sufficient importance that they should be resolved through discussion with the segments and State-level policy makers and ultimately addressed in statute.

### *Logistics*

Implementation of a comprehensive student information system will require that the system is given equal priority by all segments. The consultants suggest that phased implementation beginning at the postsecondary level may work quite well. If that

occurs, however, it could push questions of the feasibility of implementation of a K-12 system out of sight. One option available for the Commission would be to initiate immediate efforts to implement the system at the public postsecondary level, while simultaneously working with an intersegmental advisory committee to examine the feasibility of implementing some K-12 districts on a pilot basis.

### **Recommended plan of action**

The Commission will take steps to move forward on implementation of a comprehensive student information system, within existing resources, through a pilot implementation effort in 1988-89. This pilot effort will be designed to address questions of design and purpose at the policy level as well as identify cost and other implementation obstacles at the operating level. Following the completion of this one year effort, the Commission will sponsor legislation to implement the system fully if it believes the system will be cost effective.

The specific steps envisioned for the pilot effort in 1988-89 include

1. Continued consultation with the segments through continued use of an intersegmental advisory committee, as well as through the Commission's Statutory Advisory Committee, to reach consensus on the research purposes of the information, the specific data elements involved in it, and State-level administration of the system.
2. With existing Commission resources, pilot implementation of the system at the public postsecondary level if practical, in at least one major district at the K-12 level.
3. Encouragement of the University of California, the California State University, and the California Community Colleges to provide a unique student identifier as part of their regular reporting requirements for 1988-89 and thereafter. (The Commission's existing student data collection formats already provide space for this information.)
4. Encouragement of the University, the State University, and the Community Colleges to use students' Social Security number as the unique

student identifier where available, recognizing that only those Community Colleges that are in the MIS pilot project be able to provide this information.

- 5 Through the consultative process, identification of a format for a unique student identifier in the absence of a Social Security number
6. Development of a mechanism to attach the students' unique identifier to their permanent academic record and to inform them that they should provide it to any postsecondary institution in California
7. In consultation with the segments, initial construction of a data base that includes those data elements they already collect as well as space for new elements not yet identified, as a basis for developing realistic estimates of the costs to the State to implement the system
8. In close conjunction with the State Department of Education and one or more unified school districts, identification of the requirements and costs associated with implementing the student tracking system in the elementary and secondary education levels. If practical, extend the implementation of the pilot effort to one or more K-12 districts
9. In conjunction with the State Department of Education and one or more unified school districts, development of a model framework for a student information system to be used by local districts on a voluntary basis as they begin to automate their student records.
- 10 As a first step towards implementing the tracking system among independent institutions, encouragement of the Association of Independent California Colleges and Universities and its member institutions to begin providing individual student enrollment and degrees information in the same format as the public segments, including the agreed-upon unique student identifier.
- 11 In close conjunction with the California Student Aid Commission, identification of the requirements and costs associated with implementing those elements associated with student aid in California.

This pilot implementation plan would allow the Commission to test the ability of the segments' various information systems to electronically exchange the required information. On the basis of this initial effort, the Commission would develop detailed cost information that could form the basis for future coordinated budget requests

Until such time as the legal issues affecting student files are resolved, no information obtained from this first phase of implementation would be used for research purposes other than those exclusively related to the development of an effectively functioning information system. The pilot system would use students' voluntarily supplied Social Security number as their unique student identifier, it would not attempt to assign a unique substitute number for those students who fail to provide the Social Security number on a voluntary basis

The Commission will receive progress reports from staff on the implementation process throughout the year. Once sufficient agreement has been reached on issues of system design and purpose, the Commission will sponsor legislation that would (1) set in place the research goals of the system, including legally establishing the purposes for which student-based information can be used, and (2) specify the administrative/organizational framework for the system

## References

California Postsecondary Education Commission *Feasibility Plan for a Comprehensive Student Information Study. A Report to the Legislature and Governor in Response to Assembly Bill 880 (1985)*. Commission Report 86-8. Sacramento: The Commission, March 1986.

Harrison, John G. *A Comprehensive Student Information System: A Report to the California Postsecondary Education Commission from the Wyndgate Group, Ltd.* Sacramento: The Commission, in press

The Wyndgate Group, Ltd., and Arthur Young & Company. *Prospectus for a Comprehensive Student Information System*. California Postsecondary Education Commission Agenda Item 5, November 1, 1987 Meeting



# CALIFORNIA POSTSECONDARY EDUCATION COMMISSION

THE California Postsecondary Education Commission is a citizen board established in 1974 by the Legislature and Governor to coordinate the efforts of California's colleges and universities and to provide independent, non-partisan policy analysis and recommendations to the Governor and Legislature

## Members of the Commission

The Commission consists of 17 members. Nine represent the general public, with three each appointed for six-year terms by the Governor, the Senate Rules Committee, and the Speaker of the Assembly. Six others represent the major segments of postsecondary education in California. Two student members are appointed by the Governor.

As of September 1993, the Commissioners representing the general public are:

Henry Der, San Francisco, *Chair*  
C. Thomas Dean, Long Beach, *Vice Chair*  
Mim Andelson, Los Angeles  
Helen Z. Hansen, Long Beach  
Lowell J. Paige, El Macero  
Guillermo Rodriguez, Jr., San Francisco  
Stephen P. Teale, M.D., Modesto  
Melinda G. Wilson, Torrance  
Linda J. Wong, Los Angeles

Representatives of the segments are:

Alice J. Gonzales, Rocklin, appointed by the Regents of the University of California,  
Yvonne W. Larsen, San Diego, appointed by the California State Board of Education,  
Timothy P. Haidinger, Rancho Santa Fe, appointed by the Board of Governors of the California Community Colleges,  
Ted J. Saenger, San Francisco, appointed by the Trustees of the California State University,  
Kuhl M. Smeby, Pasadena, appointed by the Governor to represent California's independent colleges and universities, and  
Harry Wugalter, Ventura, appointed by the Council for Private Postsecondary and Vocational Education

The student representatives are:

Christopher A. Lowe, Placentia  
Beverly A. Sandeen, Costa Mesa

## Functions of the Commission

The Commission is charged by the Legislature and Governor to "assure the effective utilization of public postsecondary education resources, thereby eliminating waste and unnecessary duplication, and to promote diversity, innovation, and responsiveness to student and societal needs."

To this end, the Commission conducts independent reviews of matters affecting the 2,600 institutions of postsecondary education in California, including community colleges, four-year colleges, universities, and professional and occupational schools.

As an advisory body to the Legislature and Governor, the Commission does not govern or administer any institutions, nor does it approve, authorize, or accredit any of them. Instead, it performs its specific duties of planning, evaluation, and coordination by cooperating with other State agencies and non-governmental groups that perform those other governing, administrative, and assessment functions.

## Operation of the Commission

The Commission holds regular meetings throughout the year at which it debates and takes action on staff studies and takes positions on proposed legislation affecting education beyond the high school in California. By law, its meetings are open to the public. Requests to speak at a meeting may be made by writing the Commission in advance or by submitting a request before the start of the meeting.

The Commission's day-to-day work is carried out by its staff in Sacramento, under the guidance of its executive director, Warren Halsey Fox, Ph.D., who is appointed by the Commission.

Further information about the Commission and its publications may be obtained from the Commission offices at 1303 J Street, Suite 500, Sacramento, California 95814-2938, telephone (916) 445-7933.

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ONE of a series of reports published by the Commission as part of its planning and coordinating responsibilities. Additional copies may be obtained without charge from the Publications Office, California Postsecondary Education Commission, Third Floor, 1020 Twelfth Street, Sacramento, California 95814-3985

Recent reports of the Commission include.

**88-21** Staff Development in California's Public Schools: Recommendations of the Policy Development Committee for the California Staff Development Policy Study, March 16, 1988 (March 1988)

**88-22 and 23** Staff Development in California. Public and Personal Investments, Program Patterns, and Policy Choices, by Judith Warren Little, William H. Gerritz, David S. Stern, James W. Guthrie, Michael W. Kirst, and David D. Marsh. A Joint Publication of Far West Laboratory for Educational Research and Development • Policy Analysis for California Education (PACE), December 1987.

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**88-31** The Role of the California Postsecondary Education Commission in Achieving Educational Equity in California. The Report of the Commission's Special Committee on Educational Equity, Cruz Reynoso, *Chair* (September 1988)

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As of early 1989, the Commissioners representing the general public are

Mim Andelson, Los Angeles  
C. Thomas Dean, Long Beach  
Henry Der, San Francisco  
Seymour M. Farber, M.D., San Francisco  
Helen Z. Hansen, Long Beach  
Lowell J. Paige, El Macero, *Vice Chair*  
Cruz Reynoso, Los Angeles  
Sharon N. Skog, Palo Alto, *Chair*  
Stephen P. Teale, M.D., Modesto

Representatives of the segments are

Yori Wada, San Francisco, appointed by the Regents of the University of California

Claudia H. Hampton, Los Angeles, appointed by the Trustees of the California State University

Borgny Baird, Long Beach, appointed by the Board of Governors of the California Community Colleges

Harry Wugalter, Thousand Oaks, appointed by the Council for Private Postsecondary Educational Institutions

Armen Sarafian, Pasadena, appointed by the California State Board of Education

James B. Jamieson, San Luis Obispo, appointed by California's independent colleges and universities

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To this end, the Commission conducts independent reviews of matters affecting the 2,600 institutions of postsecondary education in California, including community colleges, four-year colleges, universities, and professional and occupational schools.

As an advisory planning and coordinating body, the Commission does not administer or govern any institutions, nor does it approve, authorize, or accredit any of them. Instead, it cooperates with other State agencies and non-governmental groups that perform these functions, while operating as an independent board with its own staff and its own specific duties of evaluation, coordination, and planning.

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The Commission's day-to-day work is carried out by its staff in Sacramento, under the guidance of its executive director, Kenneth B. O'Brien, who is appointed by the Commission.

The Commission publishes and distributes without charge some 40 to 50 reports each year on major issues confronting California postsecondary education. Recent reports are listed on the back cover.

Further information about the Commission, its meetings, its staff, and its publications may be obtained from the Commission offices at 1020 Twelfth Street, Third Floor, Sacramento, CA 95814-3985, telephone (916) 445-7933.